

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-10096-JLT
	)	
JUDY COLLYMORE	)	

ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE

\_\_\_\_\_Defendant Judy Collymore, by and through her undersigned attorney, hereby moves this Court to modify her conditions of release to allow her to travel to Houston, Texas by air, leaving Boston on Saturday, April 15 and returning on Monday, April 24. She will be traveling with her sister, Yvette Debnam, and her niece, Wendy Thompson, who is her third-party custodian. The purpose of the trip is to see their cousin, Jean Davis, who is terminally ill and in intensive care in the Herman's Memorial Hospital in Houston. Counsel has confirmed that Ms. Davis is a patient there. Ms. Davis is not expected to live through the week.

Ms. Collymore agrees to abide by any conditions her Pretrial Services Officer Judy Oxford places on her, such as notifying her of the place she will be staying and calling her.

Assistant United States Attorney Glenn MacKinlay and Pretrial Services Officer Judy Oxford assent to this request.

JUDY COLLYMORE  
By her attorney,  
/s/ Page Kelley  
Page Kelley  
B.B.O. #548237  
Federal Defender Office  
408 Atlantic Avenue, 3rd Floor  
Boston, MA 02110  
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 11, 2006.

/s/ Page Kelley  
Page Kelley